

**REMARKS**

Applicant's undersigned attorney would like to thank Examiner Basom for his helpful comments made during telephone conversations with applicant's attorney on March 4, 2005 and April 27, 2005. As a result of these conversations, it was agreed that Examiner Basom will telephone applicant's attorney if any questions remain after review of this amendment.

As requested by Examiner Basom during a telephone conversation with applicant's attorney on April 27, 2005, the title of the application has been amended to more specifically identify the invention.

In response to the Official Action of January 27, 2005, a minor correction is made at page 12 of the application to correct a grammatical error, claims 1, 7-10, 16-18, 24, 28, 33, 36, 43-46, 54, 55, 64, 73, 74 and 77-79 have been amended, claims 19-22, 25-27, 47-49, and 58-63, 65-72 have been cancelled, and claims 80 and 81 are newly presented. For the reasons set forth below, it is respectfully submitted that the present application is in condition for allowance.

More specifically, the amendment to the specification at page 12 at line 23 is simply to delete the word "by" and substitute the word "may," which is clearly apparent from the context of the sentence.

Referring now to page 2 of the Official Action in the section entitled "Response to Arguments," claim 16 has been amended to positively recite the material previously presented in the preamble to claim 16. Furthermore, claims 1, 7, 8, 9, 10, 16, 24, 25 and 73-79 have now been further amended, where necessary, to particularly point out and claim "spaced lines which are dependent on the positions of functional display regions," which the Examiner notes Tobey does not disclose or suggest.

35 U.S.C. §101 Rejections

Referring now to page 2 of the Official Action and the rejection of claims 1, 7-10, 36, 43-46, 65, 72, 73 and 77-79, as well as claims 2-6, 11-15, 50-53 due to their dependency from claim 1 and claims 74-76 due to their dependency from claim 73 (not claim 33 as noted in the Official Action), it is respectfully submitted that all of these claims which are still presented herein meet with the requirements of 35 U.S.C. §101 (please note that of these recited claims, claims 65 and 72 have been cancelled). More specifically, the Examiner states that there is no explicit recitation or suggestion of anything tangible in the above-cited claims nor is there any explicit recitation or suggestion that having a device, network terminal, set top box, mobile telephone, personal computer, or user interface cause anything to happen. The amendments to claims 1, 7-10, 36, 43-46, 73 and 77-79 do now explicitly recite something tangible and further the recited device, network terminal, set top box, mobile telephone, personal computer and user interface do explicitly cause something to occur. Therefore, independent claims 1, 7-10, 36, 43-46, 73, 77-79 and the dependent claims thereto are all believed to be in compliance with 35 U.S.C. § 101.

Also at page 3 of the Official Action, claims 24, 25 and 47 are rejected under 35 U.S.C. §101 on the grounds that they are directed to nonstatutory subject matter. Claims 25 and 47 have been cancelled and claim 24 has been amended in a manner which is believed to recite a computer program product in a tangible form.

Since claims 1, 7-10, 24, 73, 77-79 have not been otherwise rejected, it is therefore respectfully submitted that these claims are now in allowable form. The rejection of claims 36 and 43-46 based on prior art will be discussed below. Furthermore, claims 2-6, 11-15, 50-53, and 74-76 are also believed to be allowable since these claims depend from claims which are believed to be statutory and since art rejections were not made with regard to these claims, nor the claims from which they depend.

35 U.S.C. §102 Rejections

I. Rejections of Claims 19-22, 58, 59 61-63 and 65-72 in view of Arora et al

Referring now to the claim rejections under 35 U.S.C. §102, claims 19-22, 61-63 and 65-72 are rejected as anticipated by US patent 5,845,299, Arora et al (hereinafter Arora). Claims 19-22, 61-63 and 65-72 are cancelled and therefore the rejection of these claims is moot. At page 5 of the Official Action, the Examiner also rejects claims 58 and 59 in view of Arora. These claims are also cancelled and therefore the rejection of these claims is moot.

II. Rejection of Claims 16-18, 28-42, 45-47 and 50-53 in view of Tobey et al

Claims 16-18, 28-42, 45-47 and 50-53 are rejected at page 6 of the Official Action as anticipated in view of US patent 5,510,811, Tobey et al (hereinafter Tobey). Claim 47 has been cancelled and therefore the rejection of claim 47 is moot. It is noted however that with regard to claim 16, the Examiner states at page 2 thereof that the previous amendment was to the preamble of the claim and consequently did not breathe meaning into the context of the claim. The Examiner however did note that Tobey fails to teach spaced lines which are dependent on the positions of functional display regions. Claim 16 is currently amended to specifically point out and claim that not only are first and second sets of spaced lines defined, but further that the first and second sets of spaced lines are defined based on positions of a given set of functional display regions such that there is at least one intersection of the first and second sets of spaced lines within each functional display region of said set of functional display regions. Since this step has now been positively recited in claim 16, it is respectfully submitted that for the reasons set forth at page 2 of the Official Action and the arguments previously presented in applicant's communication of October 1, 2004, claim 16 is neither anticipated nor suggested by Tobey.

Method claims 17, 18, 28 and 33 have been amended in a manner similar to that set forth with regard to claim 16 and for similar reasons are believed to be distinguished over Tobey. It is

therefore respectfully submitted that claims 29-32 which depend from claim 28 and claims 34-35 which depend from claim 33 are also distinguished over Tobey.

Independent device claim 36, independent personal computer claim 45, and independent computer program product claim 46 have been amended in a manner similar to that of claim 16 and for similar reasons are believed to be distinguished over Tobey. It is also respectfully submitted that claims 37-42 which depend from claim 36 are similarly distinguished over Tobey.

With respect to claims 50-53, each of which depend from claim 1, it is not understood why these claims are rejected under 35 U.S.C. §102 in view of Tobey when claim 1 is only rejected under 35 U.S.C. §101. For reasons set for earlier, is believed that claim 1 defines statutory subject matter and is therefore allowable. Therefore, claims 50-53 are believed to be allowable.

#### 35 U.S.C. §103 Rejections

Referring now to page 16 of the Official Action, it is respectfully submitted that claims 43 and 44 are not obvious in view of Tobey further in view of US patent 6,034,689, White et al (hereinafter White). Claims 43 and 44 have been amended in a manner similar to claim 16 in that claims 43 and 44 specifically recite means for defining first and second sets of spaced lines in dependence upon positions of a given set of functional display regions and wherein said nodes are placed at the intersections of said spaced lines. For reasons similar to those presented above with regard to claim 16, it is therefore respectfully submitted that claims 43 and 44 are distinguished over Tobey in combination with White.

#### Allowable Subject Matter

Referring now to pages 17-18 of the Official Action, it is noted that claim 64 is objected to because it depends from a rejected claim. Claim 64 is stated to be allowable if rewritten in independent form to include the limitations of the base claim and any intervening claims. Claim 64 is now so amended.

It is further noted that claim 23 is allowed in its current form.

Claim 54 is indicated as allowable in its present form. Applicant has proposed slight amendment to claim 54 in view of the fact that the step of determining midpoints of said overlap lines in fact can be more broadly presented as defining points intermediate of said overlap lines for each of said first set of selected overlaps so as to provide a first set of intermediate points. The originally presented disclosure at page 16, lines 1-2 in reference to Figure 9c states that midpoints of the remaining overlap bars 22a, 22c, 22d serve as the x-co-ordinate of the horizontal lines 15a, 15b, 15c and this method is also used for determining the position of the lines along the y-axis (see page 16, line 3-5 and Figure 9d). Specifying midpoints do not preclude points intermediate of the overlap lines since points intermediate do include the midpoints. Points intermediate are also recited in originally presented claim 19. Therefore, although claim 54 has been slightly amended, it is still believed to be allowable since Arora does not disclose or suggest any determination of points between overlap lines wherein these points comprise a set of points through which a first set of lines extend in a second, transverse direction which passes through these points.

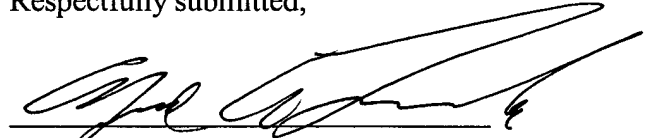
Similar amendment has been made to allowed claim 55 and for similar reasons is believed to be allowable. Furthermore, with regard to claims 73, 74 and 77, similar amendments have been made and for similar reasons, these claims are also believed to be allowable.

Finally, newly submitted claims 80 and 81 respectively claim a device for generating signals for a graphical display and a computer program product for generating signals for a graphical display. These claims are similar to method claim 54 and for similar reasons, these claims are therefore believed to be allowable.

In view of the foregoing, it is respectfully submitted that the present application as amended is in condition for allowance and such action is earnestly solicited. Applicant's

attorney respectfully requests Examiner Basom to call the undersigned attorney if there are any outstanding questions concerning the present application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alfred A. Fressola', written over a horizontal line.

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